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JUL 28 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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July 28, 1993

HAND DELIVERED

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: Ex Parte Notice - MM Docket 92-260

Dear Mr. Caton:

In accordance with Section 1.1200 et. seq. of the Commission's rules, this is to advise that on Wednesday, July 28, 1993, Peter O. Price, President, and Edward L. Milstein, Vice Chairman, of Liberty Cable Company, Inc. ("Liberty"); W. James MacNaughton; and Henry M. Rivera, Esq. of Ginsburg, Feldman and Bress, Chartered, met separately with John C. Hollar, Legal Advisor to Commissioner Ervin S. Duggan, and James Coltharp, Legal Advisor to Commissioner Andrew C. Barrett, to discuss issues affecting this proceeding.

The discussion involved presenting Liberty's position on cable home wiring. The attachments to this Ex Parte Notice were used in that discussion.

A copy of this Ex Parte Notice was filed with the Commission and delivered to all of the above-named Commission personnel on July 28, 1993.

Sincerely,

[Handwritten signature]

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JUL 28 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

LIBERTY CABLE COMPANY, INC.

**575 Madison Avenue
New York, NY 10022
(212) 891-7771**

**CABLE HOME WIRING
MM Docket 92-260**

July 28, 1993

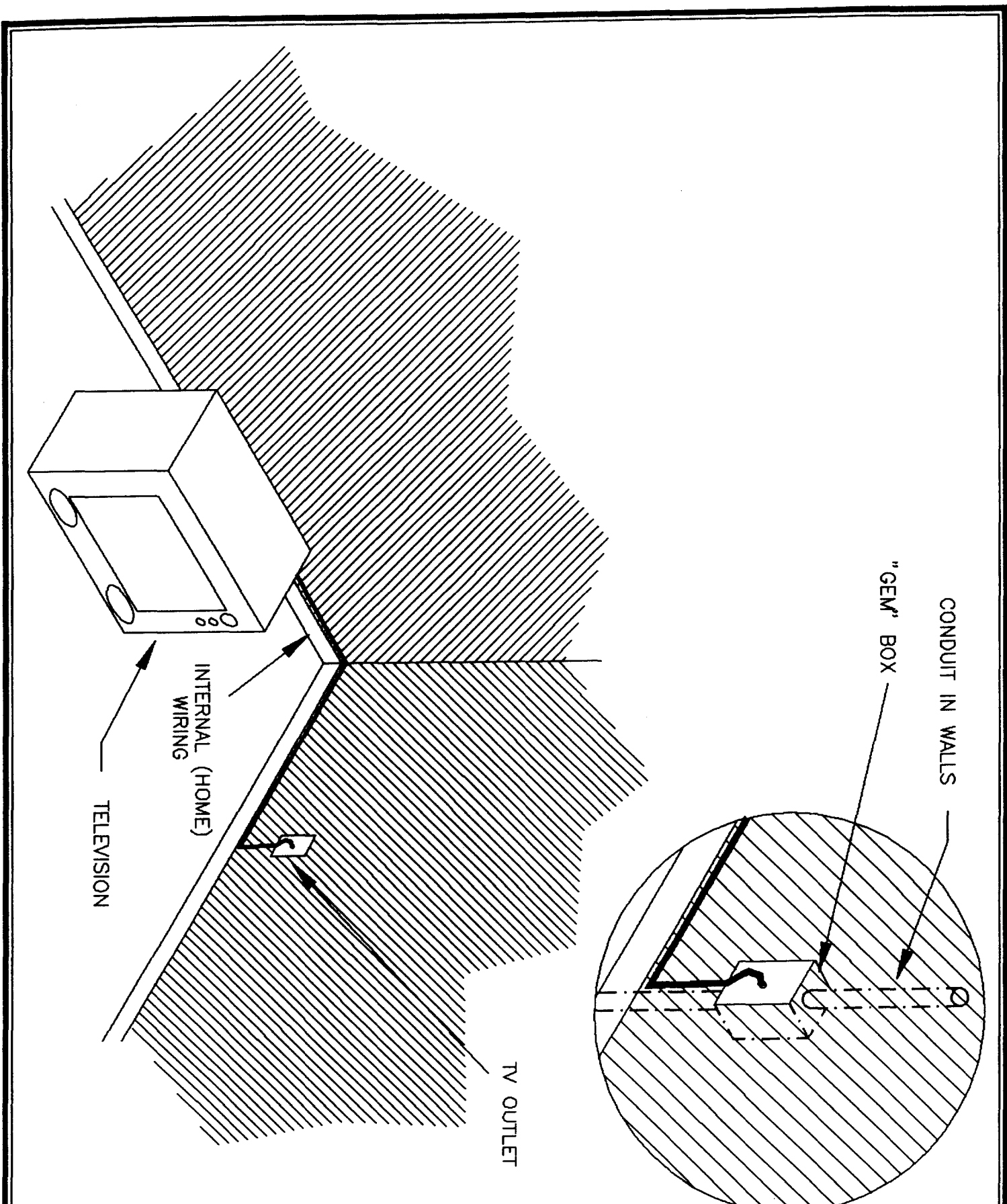
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CABLE "HOME WIRING"

- I. The demarcation point (i.e., starting point) for "home wiring" in multiple dwelling units (MDUs) (i.e., apartment buildings, condominiums and cooperatives) should be the point where an alternate provider can access individual wiring (wiring used solely to serve an individual subscriber) without physically damaging the MDU premises or interfering with the provision of cable service to other residents of the MDU.
 - The FCC in its Report and Order adopted a demarcation point for individual wiring in MDUs that is twelve inches from the point where the wiring enters the outside wall of a dwelling.
 - This demarcation point does not provide alternate providers with adequate access to individual wiring in many MDUs.
 - In many MDUs, individual wiring may be accessed only in a hallway, stairwell, basement or rooftop -- more than twelve inches from where the wiring enters a dwelling.
 - This is because individual wiring, for some distance prior to entering a dwelling, is often buried in a concrete hall floor, encased within an inaccessible conduit attached to the inner skeleton of the building or concealed behind expensive custom designed hallway mirrors or wall coverings.
- II. "Home wiring" should include "splitters" so as to resolve the space constraints in conduits and connection boxes in many MDUs which prevent alternate providers from installing a second splitter.
 - The FCC, in its Report and Order, did not specifically state that "splitters" are part of "home wiring" as Liberty had requested.
 - "Splitters" must be part of "home wiring" so as to provide alternate providers with adequate access to the dwelling.
 - If there is no room in the conduit or connection box for two splitters, the alternate provider is prevented from accessing the dwelling.

III. "Home wiring" in MDUs should include "loop through" systems.

- In its Report and Order, the FCC declined to include "loop through" wiring in its definition of "home wiring."
- A "loop though" system consists of a single wire connecting the feeder cable to many dwellings.
- If all residents on the "loop" intend to switch to an alternate provider's service, it is more efficient for an alternate provider to have access to the wire for the entire "loop."
- Control of this common portion of home wiring should be given to building owner or manager.



TIME WARNER RISER

LIBERTY RISER

LIBERTY TAP

WALL PLATE

"F" STYLE BARREL

"GEM" BOX

CONDUIT IN WALL

TIME WARNER RISER

LIBERTY RISER



LIBERTY CABLE ENGINEERING DEPARTMENT
215 EAST 95TH STREET, NEW YORK, NY 10128
(212) 735-6700, (212) 735 5678 (FAX)

COUNDUIT WIRING DETAIL
PARALLEL SYSTEM WIRING
DWG 2 OF 2

DRAWN BY: D.G
DATE: 7/27/93
DWG: LBRTY-51